

EXHIBIT 2

CJ-13-5804
Prince
FILED IN DISTRICT COURT
OKLAHOMA COUNTYIN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OCT 22 2013

ERIN MICHELLE DUFFY

Plaintiff,

vs.

NORVIN DWIGHT GARRARD,

Defendant.

TIM RHODES
COURT CLERK
50Case No. CJ-2013-
Judge: CJ-2013-5804PETITION

COMES NOW the Plaintiff, ERIN MICHELLE DUFFY, by and through her attorney Bradley H. Mallett of the Taylor, Burrage, Foster, Mallett, Downs, Ramsey & Russell law firm and for her causes of action against the Defendant NORVIN DWIGHT GARRARD alleges and states as follows:

1. Plaintiff Erin Duffy is an individual residing in Windsor, Colorado. At the time of the accident at issue, she was a resident of Edmond, Oklahoma, Oklahoma County.
2. Defendant Dwight Garrard is an individual residing in Mustang, Oklahoma, Canadian County.
3. The automobile accident which is the subject of this lawsuit occurred in Oklahoma County, Oklahoma. Therefore, jurisdiction and venue are properly before this Court.
4. On or about December 23, 2011, Plaintiff was driving her vehicle east bound on West Memorial Road when her vehicle was negligently struck from the rear by a vehicle driven by Defendant.

5. As a result Plaintiff sustained injuries resulting in medical bills, pain and suffering in the past and future, loss of consortium, loss of parental consortium, and the need for future medical treatment, all in excess of \$75,000.00.

6. As a direct and proximate result of the Defendant's negligence, the Plaintiff suffered and continues to suffer the following injuries and damages:

- a. Medical expenses in the past and future;
- b. Physical pain and mental anguish in the past and future;
- c. Permanent injury;
- d. Lost earnings;
- e. Loss of earning capacity;
- f. Loss of consortium in the past and future.

WHEREFORE, premises considered, Plaintiff prays for judgment against the Defendant in an amount exceeding \$75,000.00, together with interest, costs and attorney fees and for such other and further relief as this Court deems necessary, equitable and proper.

Respectfully submitted,

**Taylor, Burrage, Foster, Mallett,
Downs, Ramsey & Russell**
A Professional Corporation



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